PROPOSED ACTION

Winter Flats Pipeline Project
for
Buried Natural Gas and Water Pipelines
Mesa County, Colorado

DOI-BLM-CO-N040-2015-0017-EA

Prepared by

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Prepared for

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1. INTRODUCTION

NUMBER: DOI-BLM-CO-N040-2015-0017-EA

PROJECT NAME: Winter Flats Pipeline project

PLANNING UNIT: Grand Junction Field Office

APPLICANT: The company contact for the proposed project is:

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1.1 BACKGROUND

Red Rock Gathering Company, LLC (RRG), a subsidiary of Summit Midstream Partners (Summit), is proposing to construct approximately 21.9 miles of varying-sized buried steel natural gas pipelines, and a collocated 10.8-mile water pipeline along the Winter Flats alignment. Included in the total pipeline mileage, RRG is also proposing to construct a 1.3-mile buried steel natural gas pipeline and collocated water pipeline to the Black Hill Plateau Production (BHP) Wagon Track 12-16 pad location (the Wagon Track 12-16 Lateral). Construction and operation of the 21.9 miles of varying-sized natural gas and water pipelines is collectively called the Winter Flats Pipelines Project (Project).

RRG is a midstream gas-gathering and processing company in the Piceance Basin. Although the project area lies within the administrative boundaries of the Bureau of Land Management (BLM) Grand Junction Field Office (GJFO), it is being managed by the Colorado River Valley Field Office (CRVFO) in Silt, Colorado. The change in BLM management of the National Environmental Policy Act (NEPA) process for this and other oil and gas developments in the GJFO area is part of a consolidation in Colorado BLM's Northwest District that became effective on October 1, 2014.

1.2 PROJECT LOCATION AND LEGAL DESCRIPTION

The Project area is located on public land and a lesser amount of private lands in Mesa County, Colorado, west of the Town of De Beque, and south of a major topographic feature known as South Shale Ridge. The proposed pipeline alignment would start at BHP's Winter Flats 1-2-100 natural gas pad site in Section 3, Township 9 South, Range 97 West, and would terminate at RRG's De Beque Processing Plant in Section 28, Township 8 South, Range 97 West.

The legal description for the project (all in the Sixth Principal Meridian) is as follows:

Township 9 South, Range 100 West, Sections 2 and 11-12;
Township 9 South, Range 99 West, Sections 7-12;
Township 9 South, Range 98 West, Sections 1-4, 7-9, and 11-12;
Township 8 South, Range 98 West, Section 36;
Township 8 South, Range 97 West, Sections 29 and 31-32.

The Project area is within the De Beque, Wagon Track Ridge, Winter Flats, and Corcoran Peak U.S. Geological Survey (USGS) 7.5-minute topographic quadrangles and is shown on the Proposed Action Location Map on the following page (**Figure 1**).

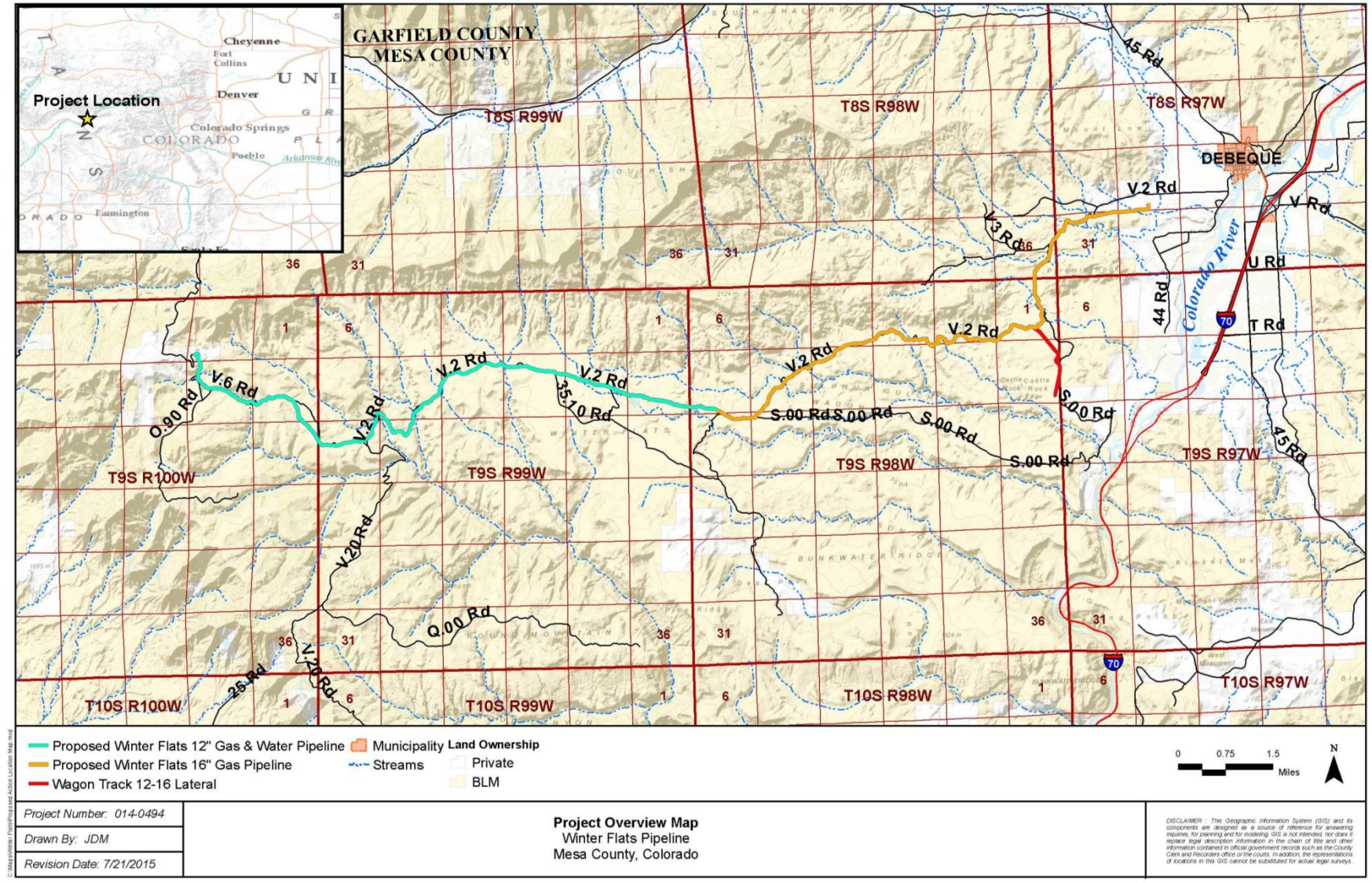

Figure 1. Project Location Map

1.3 PURPOSE AND NEED

The purpose of this action is to provide an opportunity for RRG to use public land located in the GJFO administrative area to construct, operate, and maintain proposed 8-inch, 12-inch, and 16-inch natural gas pipelines, 8-inch and 12-inch water pipelines, and temporary extra workspace located along or near Mesa County V.2 Road near De Beque, CO. The total length of the proposed pipeline corridor would be 21.9 miles (**Table 1**).

The purpose also includes the opportunity to consider a route and design that would ensure that the project is conducted in an environmentally responsible manner with minimal impacts to natural resources.

The need for the action is established by BLM's responsibility under the 1976 Federal Land Policy Management Act (FLPMA) and under the Mineral Leasing Act (MLA), 1920to respond to a request for right-of-way grants authorizing use of public land.

The action also includes design and implementation of appropriate mitigation intended to make the project consistent with the goals, objectives, and decisions of the Resource Management Plan (RMP) for the GJFO as well as with applicable Federal, State, and local laws, regulations, and policies.

1.4 PLAN CONFORMANCE REVIEW

The Proposed Action and No Action Alternative are subject to and have been reviewed for conformance with the following plan (43CFR 1610.5, BLM 1617.3):

Name of Current Plan: Grand Junction Resource Management Plan (RMP) approved in January 1987, as amended.

Decision Language: To respond, in a timely manner, to requests for utility authorizations on public land while considering environmental, social, economic, and interagency concerns.

To make Federal oil and gas resources available for leasing, except where prohibited by law or where administrative action is justified in the national interest; to make public lands available for economically and environmentally sound exploration and development projects; to avoid health and safety hazards; to protect important sensitive resource values from unacceptable impacts; and to minimize impacts to lessees from sensitive resource protection and hazard avoidance.

Pending New Plan: The BLM is currently in the process of revising the Grand Junction Resource Area RMP. On April 10, 2015, a Proposed RMP and Final Environmental Impact Statement was released, but a Record of Decision (ROD) and approved RMP has not been adopted as of this writing. This project has been reviewed, and the BLM has determined that a decision would not impair resource values to constrain the adoption of the Proposed RMP or otherwise limit the choice of reasonable actions relative to the land use plan decisions contained in the Proposed RMP.

1.5 LAND HEALTH STANDARDS

To be added following completion of resource-by-resource analysis.

1.6 SCOPING

NEPA regulations (40 CFR §1500-1508) require that the BLM use a scoping process to identify potential significant issues in preparation for impact analysis. The principal goals of scoping are to allow public participation to identify issues, concerns, and potential impacts that require detailed analysis.

The BLM placed a news release in the Grand Junction *Daily Sentinel* and the Glenwood Springs Post Independent on July 16, 2015. The news release, a posting on the BLM website, and a Dear Interested Public letter mailed to neighboring landowners and other interested parties invited the public to provide comments on the Proposed Action. The comment period extended through from July 16 through August 17, 2015.

1.7 DECISION TO BE MADE

This EA was prepared in conformance with the policy guidance provided in BLM's NEPA Handbook H-1790-1 (BLM 2008a). The BLM Handbook provides instructions for compliance with the Council on Environmental Quality (CEQ) regulations for implementing the NEPA process (40 CFR §1500-1508) and U.S. Department of Interior (USDI) Manual 516 DM 1-7 on NEPA compliance (USDI 2008).

The BLM may choose to (a) authorize the project as proposed, (b) authorize the project with modifications developed by the BLM in collaboration with the proponent, or (c) not authorize the project at this time. Options (a) or (b) would include application by the BLM of Conditions of Approval (COAs) at mitigation to avoid, minimize, or offset adverse project impacts.

The Decision Record associated with this EA may not constitute the final approval for all actions, such as individual right-of-way grants and temporary use permits associated with the proposed action. It does, however, provide the BLM with an analysis from which to base the final approval, if warranted, for individual project components.

2. PROPOSED ACTION AND ALTERNATIVES

2.1 PROPOSED ACTION

RRG is proposing to construct approximately 10.8 miles of 12-inch diameter and 9.8 miles of 16-inch diameter buried steel natural gas pipelines, called the Winter Flats Pipeline. RRG is also proposing to construct an additional 1.3 miles of 8-inch diameter buried steel natural gas pipeline called the Wagon Track 12-16 Lateral. These combined components would result in 21.9 miles of new natural gas pipelines and related aboveground facilities. These gas gathering pipelines would be used to transport natural gas to RRG's De Beque Gas Processing Plant, located at 4325 V.2 Road. The project would ultimately provide natural gas to regional and national markets for the use and benefit of the public.

If approved, the BLM authorize the natural gas pipelines under the Mineral Leasing Act (MLA) by issuing Right-of-Way (ROW) grant COC 76833 and Temporary Use Permit (TUP) COC 76833T. See **Table 1** for a summary of the requested authorizations.

In addition to the natural gas pipelines, RRG would construct water pipelines for which BHP is seeking a ROW grant from BLM under the authority of the Federal Land Management Policy Act (FLPMA). See **Table 1** for information related to the proposed waterlines (COC 76837). The water pipelines would be used to transport produced water from the oil and gas wells to BHP's existing water handling facility

adjacent to RRG's gas processing plant and to transport a combination of fresh water and treated/recycled produced water to the well pads for use in completions (hydraulic fracturing, or "HF").

Table 1. Information on Requested Right-of-Way Grants and Temporary Use Permits

Serial Number	***Authority***	***Term***	***Type***	***ROW Length (miles)***	***ROW Width [1] (feet)***	***ROW Area (acres)***
COC 76833 (RRG)	MLA	30 years	12-inch buried steel natural gas pipeline	10.8 (57,024 feet)	50	65.45
			16-inch buried steel natural gas pipeline	9.8 (51,744 feet)	50	59.39
			8-inch buried steel natural gas pipeline	1.3 (6,864 feet)	50	7.88
			2 valve yards			0.07
			TOTAL	**21.9 (115,632 feet)**		**133.06**
Serial Number	***Authority***	***Term***	***Type***	***TUP Length (feet)***	***TUP Width (feet)***	***TUP Area (acres)***
COC 76833T (RRG)	MLA	3 years	Pipeline Construction	10.8 (57,024 feet)	25	65.45
				9.8 (51,744 feet)	25	59.39
				1.3 (6,864 feet)	25	7.88
			41 Extra Work Spaces	--	--	1.41
			9 Storage Yards	--	--	12.91
			2 Valve Yards	--	--	0.3
			TOTAL	**21.9 (115,632 feet)**		**80.98**
Serial Number	***Authority***	***Term***	***Type***	***ROW Length (miles)***	***ROW Width (feet) [1]***	***ROW Area (acres)***
COC 76837 (BHP)	FLPM	30 years	12-inch steel water pipeline	10.8 (57,024 feet)	--	65.45
			8-inch steel water pipeline	1.3 (6,864 feet)	--	59.39
			8-inch steel re-purposed water pipeline	9.8 (51,744 feet)	--	7.88
			TOTAL	**21.9**	**--**	**132. 72**

[1] **Permanent** ROW and TUP for MLA natural gas and FLPMA water pipelines are coincident.

This ROW grant to BHP would include 10.8 miles of 12-inch diameter steel produced water pipeline collocated with the 12-inch gas pipeline and 1.3-miles of 8-inch produced water pipeline collocated along the Wagon Track 12-16 Lateral pipeline. In addition, 9.8 miles of an existing 8-inch steel natural gas pipeline would be re-purposed for use as a water pipeline, collocated with the 16-inch gas pipeline. Because the water and natural gas pipelines would be collocated, the ROW grant to BHP would represent no additional permanent ROW width and would not require a separate TUP.

The proposed Winter Flats Pipeline corridor generally follows existing 6-inch and 8-inch natural gas pipelines constructed in the early 1980s and now operated by RRG. The Wagon Track 12-16 Lateral would be a new pipeline originating at the BHP Wagon Track 12-16 pad and tying into the Winter Flats Pipeline; the proposed Wagon Track 12-16 Lateral does not follow any existing pipeline ROWs.

The 21.9 miles of shared permanent ROWs being sought by RRG and BHP would be 50 feet in width and include 132.72 acres. The term would be 30 years. The TUP sought by RRG (but also used for the BHP water pipelines) would have a term of 30 years and include 80.98 acres. As shown in **Table 1**, this would mostly represent a 25-foot-wide area adjacent to the permanent ROW for use in constructing the pipelines. An additional 14.61 acres of the TUP would accommodate 2 valve yards, 9 storage yards, and 41 extra workspaces (ESWs).

Resource surveys conducted on behalf of RRG have identified four areas with sensitive resources (a Federally listed threatened plant species and cultural resources) within the proposed ROW. RRG would avoid potential disturbance to these sensitive features by using horizontal directional drilling (HDD) or conventional boring to cross these areas during construction. The areas proposed to be crossed by boring or HDD would include approximately 3,056 feet along the pipeline alignment.

Additional surface disturbance would include nine temporary storage yards and 41 temporary extra workspaces (EWSs) to facilitate construction of the pipelines. The storage yards would range from 100 by 100 feet to 250 by 250 feet in area. The EWSs would typically be 15-foot-wide extensions from the construction corridor and extend approximately 100 feet parallel to the construction corridor for crossing drainages and steep, rocky areas. Two new aboveground valve yards would be 100 feet by 100 feet and 50 feet by 50 feet in size during initial construction. The larger valve yard 1 would be located where the proposed 12-inch gas pipeline and 12-inch water line would be resized to a proposed 16-inch gas pipeline and existing 8-inch water line. The smaller valve yard would be located at the Wagon Track 12-16 Lateral tie-in. RRG would reclaim a portion of the surface disturbance of these valve yards to minimize the amount of surface disturbance during long-term operations.

Construction of the project is anticipated to begin in fall 2015, pending completion of this analysis under NEPA, authorization by the U.S. Army Corps of Engineers (USACE) pursuant to Section 404 of the Clean Water Act, and consultation with the U.S. Fish and Wildlife Service (USFWS) pursuant to Section 7 of the Endangered Species Act. Anticipated duration of the construction would be approximately 9 to12 months. Site reclamation would occur after completion of pipeline installation and is anticipated to be completed prior to winter of 2016-2017. The pipeline would be operated on a year-round basis by RRG.

2.1.1 Proposed Project Activities

Pre-Construction Civil Surveys

Civil surveys would be performed to identify the centerline of the pipeline and the boundaries of both sides of the approved workspace before construction activities commence. Flagged or painted lath would be set at intervals required to maintain line of sight along the proposed centerline and at the edges of the work limits. All EWSs would be marked in a similar fashion and all four corners of each EWS would be marked by flagged or painted lath. RRG's construction inspectors would be responsible for verifying that the limits of authorized construction work areas are staked prior to construction. Access to the ROW and construction areas would be from V.2 Road and S Road.

Clearing, Grading, and Topsoiling

Vegetation would be cleared and the construction workspace graded to provide for safe and efficient operation of construction equipment and vehicles, and to provide space for the storage of subsoil and topsoil. Construction activity and ground disturbance would be limited to approved, staked areas.

Trees would be cut with a chain saw and/or mechanical shears and brush would generally be cut with a hydro-axe or similar equipment. Trees and brush would be cut as close to the ground as possible. Vegetation would typically be chipped or shredded and incorporated into the topsoil, or stored onsite for reuse during reclamation activities. Stumps that are not shredded or chipped and incorporated into the topsoil would be removed and disposed of at an approved disposal facility.

Topsoil would be salvaged, when not wet or frozen, windrowed along the pipeline route to facilitate revegetation of the workspace after construction is complete.

All topsoil, to a depth of 6 inches (if available), would be removed from the trench line and working side of the workspace. Topsoil would be stockpiled separately from subsoil and would not be used to pad the trench or construct trench breakers. Dry drainages or washes that cross the construction workspace would not be blocked with topsoil or subsoil piles. Topsoil and subsoil would be placed outside of the ordinary high water marks of drainages. Gaps would be left periodically in the windrowed topsoil and subsoil to avoid ponding and excess diversion of natural runoff during storm events.

Trenching and Blasting

Access would be provided for landowners and grazing permittees to move vehicles, equipment, and livestock across the trench where necessary. RRG would contact livestock operators and provide adequate crossing facilities as needed to ensure livestock are not prevented from reaching water sources due to the open trench.

RRG and their Contractors would keep wildlife and livestock trails open and passable by adding soft plugs (areas where the trench is excavated and replaced with minimal compaction) during the construction phase. Soft plugs with ramps on either side would be left at all well-defined livestock and wildlife trails to allow access across the trench and provide a means of escape for livestock and wildlife that may fall into the trench.

No blasting is expected to be required for pipeline construction. Instead, crews would utilize rock-saws to excavate through rock where rock formations are encountered during construction.

Pipe Welding and Coating

The joints of natural gas and water pipe would be strung along the ditch and welded together. When necessary, pipe would be bent to accommodate horizontal and vertical changes in direction. Pipe joints would be lined up end-to-end, clamped into position, and welded in accordance with regulations and standards currently required for natural gas pipelines or water lines, as applicable. All welds would be visually inspected by a qualified inspector. Non-destructive radiographic inspection methods would be conducted in accordance with current requirements. Any defects would be repaired or cut out as required under the specified regulations and standards.

All of the natural gas and water pipeline segments would have cathodic protection against internal corrosion, with one rectifier serving both lines. To prevent surface corrosion, the pipe would be externally coated with fusion-bonded epoxy coating prior to delivery. After welding, field joints would be coated with a tape wrap, shrinkable sleeve wrap, or field-applied fusion-bond epoxy. Before the natural gas and water lines are lowered into the trench, the coating would be visually inspected and tested with an electronic detector, and any faults or scratches would be repaired.

Lowering-in and Padding Pipeline

Before the pipe section is lowered into the ditch an inspection would be conducted to verify that the pipe is properly fitted and installed in the ditch, minimum cover is provided, and the trench bottom is free of rocks and other debris that could damage the external pipe coating. Dewatering may be necessary where water has accumulated in the trench. The pipe sections would be simultaneously lifted in position over the ditch and lowered in place. The natural gas pipeline and water line would be laid in the same trench, with approximately 24 inches of separation. Sifted soil fines from the excavated subsoils would provide rock-free pipeline padding and bedding. Sandbags may be used to pad the bottom of the ditch instead of, or in combination with, padding with soil fines. In rocky areas, padding material or a rock shield would be used to protect the pipe.

Backfilling

Backfilling would begin after a section of pipe has been successfully placed in the ditch. Backfilling would be conducted using a bulldozer or other suitable equipment. Backfilling the trench would generally use the subsoil previously excavated from the trench, except in rocky areas where imported, appropriate fill material may be needed. Backfill would be graded and compacted, where necessary for ground stability, by tamping or walking with a wheeled or tracked vehicle. Compaction would be performed to the extent that there are no voids in the trench. Any excavated materials or materials unfit for backfill would either be utilized elsewhere, shallowly mounded on the trench (to help avoid settling issues) or properly disposed of in conformance with applicable laws or regulations.

Hydrostatic or Pneumatic Pipeline Testing

The maximum allowable operating pressure (MAOP) for the gas pipeline would be 1,440 pounds per square inch (psi), and the MAOP for the water line would be 1,000 psi. The pipeline would be pressure-tested in compliance with regulations. Prior to filling the pipeline with water or an inert gas for hydrostatic or pneumatic testing, each section of the pipeline would be cleaned by passing reinforced poly pigs through the interior of the line. Incremental segments of the pipeline would then be filled with water, compressed air, or nitrogen; pressurized; and held for the duration of the test. The length of each segment tested would depend on topography. Water for hydrostatic testing would be acquired from the Town of De Beque and, following testing, delivered to the BHP water treatment facility for treatment and re-use of disposal.

Cleanup and Restoration

Cleanup and restoration would occur after the pipeline is installed and after backfilling is completed. Cleanup of the surface along the construction workspace and any EWSs would include removing any construction debris and final grading the areas to the finished contour. Erosion control measures would be installed and seeding would be performed in accordance with BLM requirements. On private lands, the landowner would have the ability to specify how revegetation is conducted, such as use of a different seed mix.

All irrigation ditches, cattle guards, fences, and artificial and natural livestock and wildlife water sources would be repaired to at least pre-construction conditions.

Livestock Barrier and Other Livestock Issues

RRG, in conjunction with BHP, would provide compensation or interim measures for any critical facilities (such as watering sites) that are disrupted during the construction or restoration process through prior agreements with the BLM, grazing permittees or landowners. Temporary fencing would be installed as required by pre-construction agreements with landowners to prevent livestock entry into the

construction workspace. Livestock crossovers (trench plugs), with ramps on either side of the open trench, would be utilized at maximum 1-mile intervals and at well-defined livestock and wildlife trails to facilitate passage of livestock across the construction workspace and to prevent livestock from becoming trapped in the trench.

2.1.2 Summary of Project-Related Surface Disturbance

Pipeline ROW

The proposed construction corridor would be a maximum of approximately 75 feet wide. This would include a 50-foot-wide permanent ROW and a 25-foot wide TUP area. The pipeline would cross approximately 21.4 miles of BLM-managed lands and 0.5 mile of private lands. An open trench approximately 4 feet wide and 5 feet deep would be dug using either a trackhoe or trenching machine, and RRG would then install the natural gas and produced water lines as described above. The trench would be backfilled and the surface recontoured as near as practical to preconstruction conditions and reclaimed using BLM recommended seed mixes. The proposed pipeline has been sized to accommodate BHP's current and future estimated gas production.

Table 2 summarizes the amount of temporary and long-term disturbance associated with the Proposed Action.

Table 2. Surface Disturbance Associated with the Proposed Action

Proposed Action Components	*Temporary Disturbance*		*Long-Term Disturbance*
	Miles	*Acres*	*Valve Yards*
Main Winter Flats Alignment (V.2 Road)			
12-inch Natural Gas and Water Pipelines	10.8	97.9	-
16-inch Natural Gas Pipeline	9.8	86.1	-
Valve Yards (2)	-	0.3	0.07
Valve Sets (7)	-	0.04	-
Storage Yards (9)	-	8.1	-
Extra Work Spaces (41)	-	4.8	-
Subtotal		**197.24**	
Wagon Track 12-16 Lateral Alignment			
8-inch Natural Gas and Water Pipelines	1.3	10.0	-
Total	**21.9**	**207.2**	**0.07**

Temporary EWSs and Storage Yards

Temporary EWSs would be required for construction workspace along the ROW and would be used to store pipe, construction equipment, and materials. Forty-one EWSs would be utilized for the project. In addition, RRG would also use nine additional temporary storage yards along the project ROW for staging and equipment storage.

Aboveground Appurtenances

Pipeline markers would be placed along the pipeline route as necessary in accordance with safety requirements. Aboveground valve sets to accommodate future pipeline tie-in locations, mainline valve

sets to allow the pipeline to be segregated into sections for future maintenance, and pig launcher/receivers would be required on BLM lands. All natural gas volume measurement would occur at the well pad locations and at the two valve yards, described below.

Permanent aboveground appurtenances at the two valve yard sites would include exposed aboveground sections of pipe, valves, pig launchers and receivers, and small (5-foot by 5-foot) sheds containing natural gas measuring equipment. Small containers would also be onsite to help catch fluids from pigging operations. Valve yard sites are adjacent to the existing roadways to facilitate vehicle access during normal operations; steel guard posts/poles would be installed to protect facilities from vehicles.

During construction, two valve yard areas (50 feet by 50 feet and 100 feet by 100 feet) would be temporarily disturbed. Valve yard areas would be mostly reclaimed and revegetated, with some permanently graveled areas remaining to facilitate access and operations. The graveled areas would be kept free of vegetation for safety reasons. The two valve yards would total 0.3 acre of initial disturbance and 0.074 acre of long-term disturbance. All aboveground facilities and appurtenances would be painted to BLM specifications to reduce visual impacts. If livestock or unauthorized public access to valve yards becomes an issue, fencing may be installed to keep livestock out and discourage public access to these sites.

2.2 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD

During project planning, BLM and RRG investigated two alternative alignments in the western portion of the Winter Flats Pipeline. One alternative included a deviation for the main V.2 Road alignment to follow the existing corridor that cuts off two major curves in the road alignment, reducing overall pipeline length. This also would have kept the alignment within the previously disturbed corridor, although the period of around 30 years since it was constructed has allowed essentially complete restoration. This alternative alignment was not carried forward in the NEPA analysis because it would have included a segment within the proposed South Shale Ridge Area of Critical Environmental Concern (ACEC) as identified in GJFO's Proposed Resource Management Plan.

Initially when it was determined that following the existing corridor where it deviates from the V.2 Road was not suitable, RRG investigated a deviation to the south of the road to avoid the two major curves mentioned above. However, resource surveys and the rugged nature of a portion of that alternative segment led to decision not to consider it further and instead to follow the V.2 Road along the entire pipeline length.

2.3 NO ACTION ALTERNATIVE

For this project, the No Action Alternative would consist of denial by the BLM of the ROW application submitted by RRG for use of Federal land. Consequently, construction of the pipeline would not occur on BLM-managed land under this alternative. Because no alternative, non-Federal alignment has been identified by RRG, such an alignment is speculative, and this EA therefore assumes that the No Action Alternative would constitute abandonment of the project as proposed.